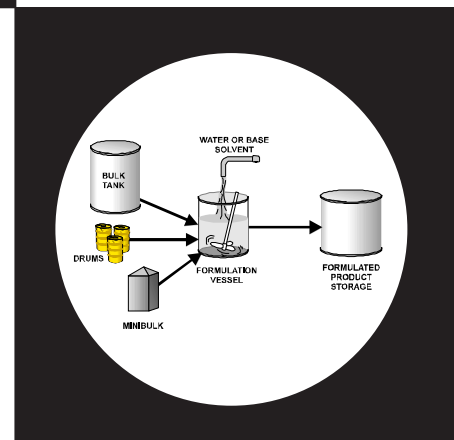
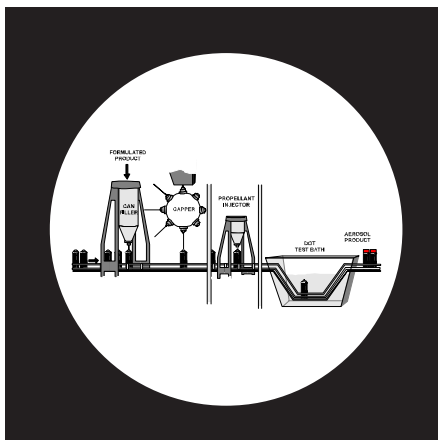
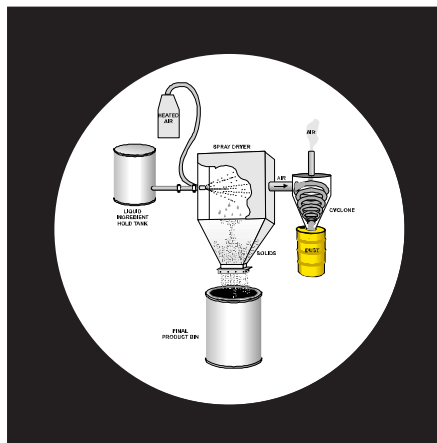




# Final

# Pollution Prevention (P2) Guidance Manual for the Pesticide Formulating, Packaging, and Repackaging Industry: Implementing the P2 Alternative



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**Final**

**Pollution Prevention (P2) Guidance Manual**  
**for the**  
**Pesticide Formulating, Packaging,**  
**and Repackaging Industry:**  
**Implementing the P2 Alternative**

Office of Water  
and  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
Washington, DC 20460

## **Notice**

This manual was made available in draft form to regulators and members of the regulated community. Comments received on the draft manual have been incorporated into this final manual. Mention of trade names or commercial products does not constitute endorsement or recommendation for use. The policies set forth in this manual are not final Agency actions but are intended solely as guidance. The manual does not substitute for the Clean Water Act or EPA's regulations; nor is it a regulation itself. Thus, it cannot impose legally-binding requirements on EPA, States, or the regulated community, and may not apply to a particular situation based upon the circumstances. EPA and local decisionmakers retain the discretion to adopt approaches on a case-by-case basis that differ from this guidance where appropriate. EPA may change this guidance in the future.

## Foreword

This Pollution Prevention (P2) manual discusses the applicability and implementation of effluent limitations guidelines and standards covering the pesticide formulating, packaging, and repackaging (PFPR) industry. The main purpose of the manual is to provide guidance to industry and permittees in the process of complying with this rule, in particular, complying with the P2 Alternative Option. EPA has received numerous requests from refilling establishments questioning how the final rule applies to them. This foreword is an aid to facilities in determining if the information contained in this manual is applicable to them.

The final rule is applicable to two subcategories of new and existing PFPR operations as discussed in the box to the right. In general, because refilling establishments covered under Subcategory E must achieve zero discharge, the P2 alternative guidance provided in this manual is not applicable. However, if a refilling establishment also performs PFPR operations covered under Subcategory C, for which the P2 alternative is an option, that facility may be interested in obtaining a copy of this manual, as they could commingle their Subcategory E wastewater with their Subcategory C wastewater and choose to follow the Subcategory C regulations (i.e., zero discharge or the Pollution Prevention Alternative).

More specifically, the final rule for Subcategory C facilities requires either zero discharge of pollutants or the P2 alternative, which allows a discharge of pollutants if certain P2 practices are implemented, followed by

### PFPR Subcategories

**Subcategory C:** Pesticide formulating, packaging, and repackaging (PFPR), including pesticide formulating, packaging, and repackaging occurring at pesticide manufacturing facilities (PFPR/Manufacturers) and at stand-alone PFPR facilities (does not include research and development operations).

**Subcategory E:** Repackaging of agricultural pesticide products at refilling establishments. Refilling establishments are defined as establishments where the pesticide product is repackaged into refillable containers. The limitations and standards of the rule covered under Subcategory E apply only to the repackaging of pesticide products performed by refilling establishments: (a) that repackage agricultural pesticides; (b) whose primary business is wholesale or retail sales; and (c) where no pesticide manufacturing, formulating, or packaging occurs. Custom application and custom blending operations are not covered under Subcategory E.

treatment as necessary. Facilities can choose the P2 alternative on a facility-wide basis or by product family/process line/process unit.

The final rule for Subcategory E facilities requires zero discharge of pollutants; there is no option for an allowable discharge after implementing approved P2 practices. The zero discharge limitation is based on collection and storage of process wastewaters, including rinsates from cleaning minibulk containers and their ancillary equipment and wastewaters from secondary containment and loading pads, with the exception of contaminated storm water. In most cases, refilling establishments hold wastewater until it can be applied as pesticide in accordance with the product label or reused as make-up water in an application of pesticide chemical to an appropriate site. Data collected by EPA show that 98% of all refilling establishments already achieve zero discharge, primarily by holding contaminated wastewater and reusing it as make-up water.

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## **Acknowledgments**

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